

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in compliance with D.N.J. LBR 9004-1(b)

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Counsel to Arnold & Itkin LLP

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Chapter 11

Case No. 23-12825 (MBK)

Hearing Date and Time:
June 27, 2023 at 10:00 a.m. ET

**DECLARATION OF LAURA DAVIS JONES IN SUPPORT OF
REPLY IN SUPPORT OF MOTION OF ARNOLD & ITKIN, ON BEHALF OF
CERTAIN TALC CLAIMANTS, TO DISMISS CHAPTER 11 CASE**

Pursuant to 28 U.S.C. § 1746, I, Laura Davis Jones, Esq., declare under penalty of perjury as follows:

1. I am a partner in the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZ&J” or the “Firm”), located at 919 North Market Street, 17th Floor, Wilmington, Delaware 19801, and have been duly admitted to practice law in the State of Delaware, the United States District Court

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

for the District of Delaware, the United States Court of Appeals for the Third Circuit, and the United States Supreme Court.

2. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein. If called as a witness, I would testify as to those facts.

3. I submit this Declaration in support of the *Reply in Support* (the “Reply”) of *Motion of Arnold & Itkin LLP, on Behalf of Certain Talc Personal Injury Claimants, to Dismiss Chapter 11 Case* (the “Motion to Dismiss”).²

4. A true and correct copy of the Brief for Appellant cited in the Reply is attached hereto as **Exhibit 1**.

5. A true and correct copy of the Brief for Debtor-Appellee cited in the Reply is attached hereto as **Exhibit 2**.

6. A true and correct copy of the Reply Brief for Appellant cited in the Reply is attached hereto as **Exhibit 3**.

7. A true and correct copy of the Reporter’s Transcript of Oral Argument before the Third Circuit, 10/4/22 cited in the Reply is attached hereto as **Exhibit 4**.

8. A true and correct copy of the Confirmation Order in the PG&E chapter 11 case, which attached the PG&E Chapter 11 Plan cited in the Reply is attached hereto as **Exhibit 5**.

9. A true and correct copy of the *Order Granting Joint Motion of the Official Committee of Tort Claimants and the Ad Hoc Committee of Senior Unsecured Noteholders to Terminate the Debtors’ Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code* cited in the Reply is attached hereto as **Exhibit 6**.

² Capitalized terms used and not otherwise defined herein have the meanings ascribed thereto in the Reply or the Motion to Dismiss, as applicable.

10. A true and correct copy of the excerpts from the Reporter's Transcript of Deposition of John Kim, June 1, 2023 cited in the Reply is attached hereto as **Exhibit 7**.

11. A true and correct copy of the excerpts from the Reporter's Transcript of Deposition of Adam Lisman, May 31, 2023 cited in the Reply is attached hereto as **Exhibit 8**.

12. A true and correct copy of the excerpts from the Reporter's Transcript of Deposition of James Onder, June 8, 2023 cited in the Reply is attached hereto as **Exhibit 9**.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. I executed this Declaration on June 22, 2023 at Wilmington, Delaware.

By: /s/ Laura Davis Jones
Laura Davis Jones